

JORDAN CHRISTOPHER SOILEAU
VS. 2016-003771
ERA HELOCOPTERS, LLC



14th Judicial District Court
State of Louisiana
Parish of Calcasieu

THE STATE OF LOUISIANA

TO: DOLPHIN SERVICES LLC
THROUGH ITS AGENT FOR
SERVICE OF PROCESS: KIRK J
MECHE
567 THOMPSON ROAD
HOUMA, LA 70361-0310

Parish of Terrebonne, Louisiana, Defendant in said suit:

YOU ARE HEREBY CITED TO APPEAR before said Court, for said Parish, and to comply with the demand contained in the petition of JORDAN CHRISTOPHER SOILEAU, "PETITION FOR DAMAGES" against you, certified copy of which petition accompanies this citation, or file your answers thereto in writing in the office of the Clerk of Court, at the Courthouse, in the City of Lake Charles, in said Parish, within fifteen (15) days after the service hereof, under penalty of default.

Witness the Honorable Judges of said Court, at Lake Charles, Louisiana, this 9th day of September 2016.

Issued and delivered September 19, 2016

Delaine Chastain

Delaine Chastain
Deputy Clerk of Court

SERVICE INFORMATION

Received on the _____ day of _____, 20____, and on the _____ day of _____, 20____, served the above named party as follows:

PERSONAL SERVICE on the party herein named _____

DOMICILIARY SERVICE on the party herein named by leaving the same at his domicile in the parish in the hands of _____, a person apparently over the age of seventeen years, living and residing in said domicile and whose name and other facts connected with this service, I learned by interrogating the said person, said party herein being absent from his residence at the time of said service.

RETURNED:

PARISH OF _____ this _____ day of _____, 20____

SERVICE \$ _____

BY: _____
Deputy Sheriff

MILEAGE \$ _____

TOTAL \$ _____

Party No. P001

RECEIVED
2016 SEP 22 PM 3:04
CLERK OF THE
PARISH OF TERREBONNE, LA.



C M S 5 3 7 4 8 4 1
Filing Date: 09/19/2016 09:48 AM Page Count: 1
Case Number: 2016-003771
Document Name: Citation

JORDAN CHRISTOPHER SOILEAU : 14TH JUDICIAL DISTRICT COURT

VS. NO. 2016-3771 D : PARISH OF CALCASIEU

ERA HELICOPTERS, LLC AND
DOLPHIN SERVICES, LLC : STATE OF LOUISIANA

FILED: SEP 09 2016 : 
DEPUTY CLERK OF COURT

PETITION FOR DAMAGES

The petition of JORDAN CHRISTOPHER SOILEAU, resident of the full age of majority of Calcasieu Parish, State of Louisiana, with respect represents that:

1.

Made defendants herein are:

- A. ERA HELICOPTERS, LLC, a foreign corporation authorized to do and doing business in the State of Louisiana, which may be served through its agent for service of process, Corporation Service Company, 501 Louisiana Avenue, Baton Rouge, LA 70802; and
- B. DOLPHIN SERVICES, LLC, a domestic corporation authorized to do and doing business in the State of Louisiana, which may be served through its agent for service of process, Kirk J. Meche, 567 Thompson Road, Houma, LA 70361-0310.

2.

On or about September 9, 2015, plaintiff JORDAN CHRISTOPHER SOILEAU was in the course and scope of his employment with Gulf South Services, Inc. as a scaffold builder working on a vessel/structure known as the Anadarko Constitution Spar. This vessel/structure was located in navigable waters in the Gulf of Mexico offshore from the coast of Louisiana, in an area designated as Green Canyon Block 680.

3.

While JORDAN CHRISTOPHER SOILEAU was loading material into a cargo basket on the top deck of the vessel/structure, a helicopter owned by defendant ERA HELICOPTERS, LLC began to take off. The helicopter's rotor wash caused several pieces of unrestrained plywood to become airborne and fly in the air. The plywood, which was under the care, custody and control of defendant, DOLPHIN SERVICES, LLC, was not properly tied down and/or restrained and ultimately struck JORDAN CHRISTOPHER SOILEAU, causing him to fall. As a result, he sustained permanent and severe injuries.

4.

At all pertinent times hereto, employees and/or agents and assigns of ERA HELICTOPERS, LLC and/or DOLPHIN SERVICES, LLC, while in the course and scope of their employment, caused, contributed to and/or created the hazardous condition where this accident occurred wherein the defendants are vicariously liable for any and all negligent acts, fault, etc.

5.

The above-described incident occurred due to the negligence and/or fault of defendants ERA HELICOPTERS, LLC, DOLPHIN SERVICES, LLC and/or their employees, agents or assigns, thus making defendants liable and negligent unto petitioner JORDAN CHRISTOPHER SOILEAU, which acts of negligence and/or fault include but are not limited to the following:

- a. Instructing and requiring its employees to engage in dangerous operations which were not appropriate under the conditions;
- b. Failing to properly train its employees;
- c. Failing to properly tie down and/or restrain plywood and other loose objects on the top deck;
- d. Creating an unsafe condition;
- e. Failing to see what should have been seen prior to the helicopter taking off;
- f. Failing to inspect and ensure there were no loose objects on the top deck prior to take off;
- g. Improper and unsafe operation of the helicopter;
- h. Other acts of negligence and/or fault which may be proven at trial.

6.

As a result of the aforementioned accident, plaintiff JORDAN CHRISTOPHER SOILEAU sustained injuries including but not limited to injuries to the following:

- a. Severe injuries to his right shoulder;
- b. Injuries to his right arm and hand;
- c. Numerous contusions and abrasions on his body.

7.

As a result of the aforementioned accident, JORDAN CHRISTOPHER SOILEAU had to seek extensive medical attention and has been unable to engage in his regular activities from the date of this accident to this present time, such condition to continue for an indefinite future period of time.

8.

As a result of the aforementioned injuries to plaintiff JORDAN CHRISTOPHER SOILEAU, he is entitled to such damages as are reasonable on the premises of the following:

- a. Past, present and future pain, suffering, inconvenience, mental and physical anguish;
- b. Past, present and future loss of enjoyment of life;
- c. Past, present and future medical and other expenses;
- d. Past, present and future disability and loss of services;
- e. Past, present and future loss of earnings and earning capacity;
- f. Other damages which may be proven at trial.


WHEREFORE, petitioner, JORDAN CHRISTOPHER SOILEAU, prays that:

I. Defendants, ERA HELICOPTERS, LLC and DOLPHIN SERVICES, LLC, be cited and served with a copy of this petition, and required to answer same in accordance with the law;

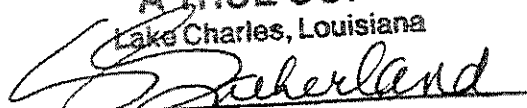
II. After due proceedings had, there be judgment rendered against defendants, ERA HELICOPTERS, LLC and DOLPHIN SERVICES, LLC, jointly, severally and in solido, in favor of petitioner, JORDAN CHRISTOPHER SOILEAU, for such an amount as is reasonable in the premises, plus legal interest on all sums awarded from date of judicial demand until paid and for all costs of these proceedings; and

III. For full, general and equitable relief.

BY THEIR ATTORNEYS:


JERE JAY BICE, BR #18793
MICHAEL G. HODGKINS, BR #20862
JULIA TAYLOR, BR #36698
Veron, Bice, Palermo & Wilson, LLC
721 Kirby Street (70601)
P.O. Box 2125
Lake Charles, LA 70602
(337) 310-1600 Fax: (337) 310-1601
Email: jay@veronbice.com
mgh@veronbice.com
julie@veronbice.com

Counsel for PLAINTIFF,
JORDAN CHRISTOPHER SOILEAU

9-14-16
A TRUE COPY
Lake Charles, Louisiana

Deputy Clerk of Court
Calcasieu Parish, Louisiana

PLEASE SERVE:

ERA HELICOPTERS, LLC

Through its agent for service of process
Corporation Service Company
501 Louisiana Avenue
Baton Rouge, LA 70802

DOLPHIN SERVICES, LLC

Through its agent for service of process
Kirk J. Meche
567 Thompson Road
Houma, LA 70361-0310

JORDAN CHRISTOPHER SOILEAU
VS. 2016-003771
ERA HELICOPTERS, LLC



14th Judicial District Court
State of Louisiana
Parish of Calcasieu

THE STATE OF LOUISIANA

TO: ERA HELICOPTERS LLC
THROUGH ITS AGENT FOR
SERVICE OF PROCESS:
CORPORATION SERVICE
COMPANY
501 LOUISIANA AVENUE
BATON ROUGE, LA 70802

Parish of East Baton Rouge, Louisiana, Defendant in said suit:

YOU ARE HEREBY CITED TO APPEAR before said Court, for said Parish, and to comply with the demand contained in the petition of JORDAN CHRISTOPHER SOILEAU, "PETITION FOR DAMAGES" against you, certified copy of which petition accompanies this citation, or file your answers thereto in writing in the office of the Clerk of Court, at the Courthouse, in the City of Lake Charles, in said Parish, within fifteen (15) days after the service hereof, under penalty of default.

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Deputy Clerk of Court

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RETURNED:

PARISH OF _____ this _____ day of _____, 20____

SERVICE \$ _____

BY: _____
Deputy Sheriff

MILEAGE \$ _____

TOTAL \$ _____

Party No. P001



C M S 5 3 7 4 8 3 5
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VS. NO. 2016 - 3771 D : PARISH OF CALCASIEU

ERA HELICOPTERS, LLC AND
DOLPHIN SERVICES, LLC : STATE OF LOUISIANA

FILED: SEP 09 2016

[Signature]
DEPUTY CLERK OF COURT

PETITION FOR DAMAGES

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of Calcasieu Parish, State of Louisiana, with respect represents that:

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- b. Failing to properly train its employees;
- c. Failing to properly tie down and/or restrain plywood and other loose objects on the top deck;
- d. Creating an unsafe condition;
- e. Failing to see what should have been seen prior to the helicopter taking off;
- f. Failing to inspect and ensure there were no loose objects on the top deck prior to take off;
- g. Improper and unsafe operation of the helicopter;
- h. Other acts of negligence and/or fault which may be proven at trial.

6.

As a result of the aforementioned accident, plaintiff JORDAN CHRISTOPHER SOILEAU sustained injuries including but not limited to injuries to the following:

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- d. Past, present and future disability and loss of services;
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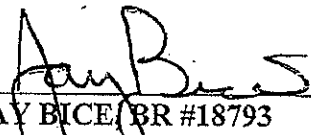
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I. Defendants, ERA HELICOPTERS, LLC and DOLPHIN SERVICES, LLC, be cited and served with a copy of this petition, and required to answer same in accordance with the law;

II. After due proceedings had, there be judgment rendered against defendants, ERA HELICOPTERS, LLC and DOLPHIN SERVICES, LLC, jointly, severally and in solido, in favor of petitioner, JORDAN CHRISTOPHER SOILEAU, for such an amount as is reasonable in the premises, plus legal interest on all sums awarded from date of judicial demand until paid and for all costs of these proceedings; and

III. For full, general and equitable relief.

BY THEIR ATTORNEYS:


JERE JAY BICE, BR #18793
MICHAEL G. HODGKINS, BR #20862
JULIA TAYLOR, BR #36698
Veron, Bice, Palermo & Wilson, LLC
721 Kirby Street (70601)
P.O. Box 2125
Lake Charles, LA 70602
(337) 310-1600 Fax: (337) 310-1601
Email: jay@veronbice.com
mgh@veronbice.com
julie@veronbice.com

Counsel for PLAINTIFF,
JORDAN CHRISTOPHER SOILEAU

9-14-16

A TRUE COPY

Lake Charles, Louisiana


Deputy Clerk of Court
Calcasieu Parish, Louisiana

PLEASE SERVE:

ERA HELICOPTERS, LLC

Through its agent for service of process
Corporation Service Company
501 Louisiana Avenue
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